

Side Farm Staffordshire Wildlife Trust Comments

Date: 29th September 2025

Application Reference: SMD/2025/0237

Location: Side Farm , Cotton Bank , Cotton , Staffordshire , ST10 3DU

Proposed Development: Siting of 4 no. glamping pods for overnight guest use, partially-covered external timber decking, associated footpaths, improvements to permeable track, new parking & turning area, secure bicycle storage, recycling/refuse storage, new septic tank and associated works.

Documents Viewed:

60005 - Megan and James Bottomley - Staffordshire ATC - Location Map.

60005 - Megan and James Bottomley - Staffordshire ATC - Report.

240834 - Design and Access Statement.

240834 - Market Research.

240834-01-01 Location Plan

240834-01-02 Proposed Layout Plan

240834-01-03 Site Photos

240834-01-04 Drainage Plan

240834-01-05 Pod Plans and Elevations

240834-01-06 Road and Access Plan

240834-01-07 Lighting Plan

240834-01-08 Storage Plans and Elevations

240834-01-09 Artist Impressions

BS 5837 Side Farm_Part1.

BS 5837 Side Farm_Part2

BS 5837 Side Farm_Part3.

BS 5837 Side Farm_Part4.

Megan Bottomley - 25_PEA_BNG_02_45 - v2 - 8.5.25.

Statement Supplementary to Planning Application for Side Farm.

Application form

BNG Calculator - Megan Bottomley - 25_PEA_BNG_02_45 – v2

Megan and James Bottomley - Staffordshire ATC - Results - Appendix 2.

Staffordshire Wildlife Trust has been asked to review the above application as part of a service level agreement with Staffordshire Moorlands District Council to provide ecology advice regarding planning and development management functions.

Summary: We recommend a **holding objection** until the following information is supplied and our further comments are resolved:

- BNG report needs to include all land within the red line boundary
- Please provide details of the BNG surveyors competency

- Grassland survey needs to be carried out at an optimal time of year by a surveyor of at least FISC level 4.
- Clarification of the type of grassland present
- If the grassland habitat is lowland meadows which is a priority habitat, we would not recommend development of the site and, if development were permitted, this would require bespoke compensation which will need to be agreed with the LPA. The metric would need updating to reflect this as detailed in the user guide.
- Provide the correct date that the pre-development biodiversity value was calculated as specified in the BNG PPG – minimum validation requirement.
- Provide the correct date that the biodiversity metric tool was published. This is a minimum validation requirement.
- Consideration of degradation of grassland due to planting of hedgerows, trampling, input of drainage, a sewer and services and appropriately inputted into the metric.
- Clarification on whether hot tubs will be installed and potential impact on priority habitats

Application Form and BNG

The application form states the date the pre-developments biodiversity value was calculated was 30/04/2025. Unless otherwise agreed with the LPA, this date should be the same date as the date that the application was submitted. [This is a minimum validation requirement as specified in the Planning practice guidance for BNG](#) so this application should not have been validated.

Please either provide proof that an earlier date has been agreed with the LPA or provide the date as the date that the application was submitted as specified in the Planning practice guidance for BNG. We are unsure whether this will require the application form to be updated. The Case Officer should specify but minimum validation requirements for BNG need to be provided.

The applications form stated that the date that the metric used was published is 01/03/2025. This is not a date that the Statutory Biodiversity Metric Calculations Tool has been published – the earliest date this was published was 29/11/2023. [This is a minimum validation requirement as specified in the Planning practice guidance for BNG](#) so this application should not have been validated. Please provide a date that the Statutory Biodiversity Metric Calculations Tool was published as per minimum validation requirements.

BNG

As per the first principle of the Biodiversity Metric Tool (and stated in the user guide), please provide further detail of the Ecologist's competency in carrying out the BNG

aspects of the survey. This should be as per BS 42020:2013's definition of a competent person.

Please note that there is a more up to date UKHab manual (v2.0) published in 2023 and this should be used in preference of version 1.1.

The BNG report does not include the whole of the application red line boundary which includes the access track – this needs to be included and the report, metric and maps updated.

The BNG maps and metric should allow for the gravel border round all pods for drainage.

Sub Optimal Timing for Grassland Survey

The survey was carried out on 3rd March 2025 which is a sub optimal time of year for carrying out grassland surveys. The survey stated the grassland is Glb – upland acid grassland in moderate condition. However, due to the time of year being sub-optimal it is likely that grassland species were not visible as it was not their growing season. Grassland surveys should be carried out between April and October, ideally between May and September (providing no cutting or grazing). We would therefore request that a botanical survey is carried out at a suitable time of year for a grassland survey, preferably by a surveyor of at least FISC level 4. This is especially important given the proximity of the site to protected sites and priority habitats and potential for the site to contain a priority habitat.

Priority Habitat

MAGIC Maps maps the area as both a priority habitat – lowland meadows and it is also mapped as acid, calcareous, neutral grassland in the living habitats map. The PEAR and BNG report states in table 6.1.1 '*Lowland Meadows has been formerly mapped on-site. The presence of this habitat was confirmed during the site survey.*'. This is contrary to the body of the report, section 5.2 and table 5.3.1 state that the grassland is G1b upland acid grassland. If the habitat is G3A lowland meadows which is a priority habitat, bespoke compensation would be required. This will need to be agreed with the LPA separately and inputted into the metric accordingly. However, we would recommend that development is not permitted on a priority habitat as per local plan policy NE1 which states '*biodiversity and geological resources of the District and neighbouring areas will be conserved and enhanced by positive management and strict control of development (and having regard to relevant ecological evidence) by:... Protecting and enhancing habitats and species of principal importance for the conservation of biodiversity as identified in legislation*'.

Strategic Significance

The area contained by the red line boundary is strategic and semi-strategic for woodland – any baseline habitats or habitats provided relating to this should be inputted as relevant in the metric.

Trees and Hedges on Meadow and Degradation Due to Trampling

The report does not consider the impact of tree planting and hedgerows on grassland condition. If this is a priority grassland habitat this is not recommended. Degradation of grassland under planned hedgerows, areas that will be dug up for drainage and a septic tank and areas that will be trampled on around the pods should be considered and inputted into the metric appropriately. Groundwork for service installation is mentioned in the design and access statement but this is not considered in the BNG report or metric.

Net Gain Condition Capable of Being Discharged?

Without knowing whether bespoke compensation is required, it is difficult to state whether the net gain condition is capable of being discharged as this would alter the contents of the metric and compensation required / recommendations regarding a priority habitat.

Impact on Priority Habitats

The artists impressions appear to include hot tubs on the decking outside each pod. Further information is requested regarding the use of hot tubs – are they to be included in the development? If so, have the impacts that the discharge of water from the hot tubs may have on adjacent priority habitats and Cotton Dell Brook which contains rare invertebrates been considered?

Conditions

These will be considered once a survey of the grassland has been carried out at an appropriate time of year as this could have a big impact on decisions regarding this development.